of Frederick County, certified copy filed here ith marked "Exhibit "A".

- 2. That being so seized, the said Ella May Sullivan, departed this life on or about the 28th of July A.D. 1923, without leaving a husband surviving her, and intestate.
- 3. That the said Eila May Sullivan died on July 28,1923, leaving surviving her as her only heirs and next of kin, your Complainant Susie E. Raines and the following infant children, named as defendants to this Bill, viz;-
  - (a) Maudie Virginia Sullivan, born Nov. 2, 1909.
  - (b) James Franklin Sullivan, born April 28, 1912.
  - (c) Paul Albert Sullivan, born Nov. 29, 1914.
  - (d) Ella May Sullivan, born July 15, 1920.
- 4. That our Orator, Maurice Hanes, is the husband of said Susie E. Hanes and joins in this Bill in that capacity.
- 5. That the said real estate, in its present state, cannot be divided among the parties in interest without loss and injury, and, furthermore, four of the five surviving children under the age of twenty-one years, and partition cannot be made without the aid of this Court, and that it would be to the inter st of all the parties concerned to sell the said real estate, and to invest the proceeds thereof in some productive fund for their benefit, under the direction of this Court.

To the end therefore.

- (A) That the said real estate may be sold, and the proceeds thereof, after accounting unto your Oratrix for her share, reinvest under the authority of this Court.
- (F) That your Oratrix and Orator may have such other and further relief as thei case may require.

  directed to
  And may it please your Honors to grant unto your Orators the writ of subpoens, Paul Albert

  Sullivan, and Ella May Sullivan, Maudie Virginia Sullivan, James Franklin Sullivan, Infants, all reseding in Frederick County, now under guardianship of Susie E. Hanes, commanding them to be and appear in this Court at some certain day to be named therein, and answer the premises and abode by and perform such decree as may be passed therein.

And as in duty bound, etc.,

Scherman P. Bowers.
Schicitor for Complainants.

State of Maryland, County of Frederick, to wit; -

I HEREBY CERTIFY, That on this 1st day of August, A.D. 1923, before me, the subscriber, a Notary Public of the State of Maryland, in and for Frederick County aforesaid, personally appeared Susie E. Hanes and Maurice Hanes and affirmed in due form of law that the matters and things contained in the aforegoing Bill are true and bona fide as therein set forth.

Notarial

Notarial (Filed August 1,1923)

Sherman P. Bowers
Notary Public.

## EXHIBIT "A"

At the request of Thomas H. Sullivan and wife the following Deed is received for record and recorded February 24th at 11.40 O'clock A.M. Test; - Samuel T. Heffner, Clerk.

This deed made this 31st day of December in the year Nineteen Hundred and seven by Charles A. Booth and Grace W. Booth, his wife, of Frederick County, State of Maryland,

WITNESSETH; That for and in consideration of the sum of Sixteen Hundred and fifty three dollars, cash in hand the receipt of which is hereby acknowledged we the said Charles A.Booth and Grace W. Booth, do hereby grant and convey in fee simple to Thomas H.Sullivan and Ella M.Sullivan, his wife, their heirs and assigns all that lot or parcel of ground and premises together with the improvements thereon and the rights and easements thereto belonging or in any wise appertaining, situated in the town of brunswick, in Frederick County State of Maryland, which is described as follows; Beginning at a point on the North side of Wenner Street 1412 feet West to Third Avenue and running thence in a Westerly direction along the North side of Wenner Street, twenty eight feet six inches; thence in a Northerly direction on a line parallel with Third Avenue one hundred and fourteen feet to the South side of a 12 foot alley; thence in an Easterly direction along the South side of said Alley